

**REMARKS**

Claims 19-42 are all the claims pending in the application. Claims 19-23 and 28 are amended, and new claims 29-42 are added. Claims 1-18, which were withdrawn, are canceled. In view of the foregoing amendments and following remarks, Applicant respectfully requests withdrawal of the rejections and allowance of the claims.

**I. Allowable subject matter**

The Examiner has indicated that dependent claims 22-24, 26 and 27 would be allowable if amended to overcome the rejections under 35 U.S.C. § 112, 2nd paragraph, and if rewritten in independent form.

Applicant thanks the Examiner for the indication of allowable subject matter. However, as discussed further below, Applicant respectfully declines to rewrite the allowable dependent claims in independent form at this time, pending further reconsideration of the rejections.

**II. 35 U.S.C. § 112, 2<sup>nd</sup> paragraph; objections**

Claims 19 (and dependent claims 23-28), 20, 21 and 23 stand rejected under 35 U.S.C. § 112, second paragraph, due to the Examiner's assertion of indefiniteness. Additionally, the Examiner objects to claims 19-22 due to various alleged informalities.

As shown in the foregoing amendments, Applicant has amended the claims in a manner that is believed to overcome the Examiner's rejections under 35 U.S.C. § 112, 2<sup>nd</sup> paragraph, and the claim objections raised by the Examiner.

Accordingly, Applicant respectfully requests withdrawal of the rejection, and allowance of the claims.

**III. 35 U.S.C. § 102(e); 35 U.S.C. § 103(a)**

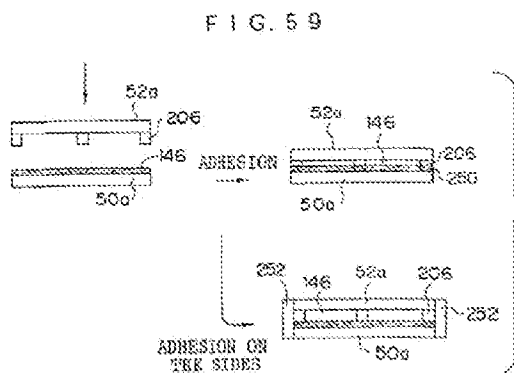
Claims 19, 20, 25 and 28 are rejected under 35 U.S.C. § 102(e) as being anticipated by Sakamaki et al (U.S. 6,836,304 B2). Claim 21 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Sakamaki et al and further in view of Ota (U.S. 3,668,106). For at least the reasons discussed below, Applicant respectfully submits that Sakamaki fails to disclose all of the claimed combinations of features, and thus, Applicant respectfully requests withdrawal of the rejections, and allowance of the claims.

The claimed invention is directed to a method of manufacturing an image display device that includes an image display panel with image display cells that are separated by partition walls, and having a transparent substrate and an opposed substrate. The cells include either two kinds of liquid powders or two kinds of particles. An electrostatic field is produced such that the liquid or powder in the cells moves accord to the potential that is applied, so as to display an image. The manufacturing is performed by (a) filling an amount of the liquid powders or particles in spaces that constitute the image display cells; (b) removing unnecessary powders or particles that remain on the partition walls from the filling step; (c) stacking the transparent substrate to the opposed substrate and applying a sealing agent at the peripheral portion of the substrate; and (d) connecting a circuit for displaying the image to the electrode, so as to form a module.

Sakamaki discloses a method of manufacturing an image medium capable of displaying an image repeatedly. As shown in FIG. 59 of Sakamaki and explained at columns 47-48, a non-display film roll 50a is provided, and powder is deposited on the non-display film roll 50a. Then, the display film roll 52a and spacers 206 are adhered to the non-display film roll 50a. As explained in detail at column 47, lines 33-46, the powder is trapped between spacer 206 and non-

display film roll 50a. Sides 252 are then adhered to the spacers 206 and film rolls 50a, 50b.

Column 7, lines 4-7 discloses that excess color particles can be removed after supplying the color particles to one of the substrates.



Applicant respectfully submits that Sakamaki fails to disclose or even suggest *filling an amount of the liquid powders or the particles in spaces constituting the image display cells isolated by the partition walls, and removing unnecessary liquid powders or unnecessary particles remaining on the partition walls in the filling step*, as recited in independent claims 19-21. While the Examiner has asserted that column 7, lines 4-7 disclose the foregoing claimed features, Applicant respectfully disagrees with the Examiner's position for at least the following reasons.

First, Applicant respectfully submits that when powder is added to the substrate of Sakamaki, there are no *image display cells*, because there are no partition walls on the substrate upon which the powder is added. As shown in FIG. 59 of Sakamaki, the powder 146 is added to the non-display film roll 50a, and then the spacer is attached on the powder 146, so that powder is trapped between the spacer and the film roll 50a.

Second, Applicant notes that column 7, lines 4-7 as cited by the Examiner is not directed to removing unnecessary liquid powders or particles *remaining on the partition walls*. As

explained above, there would not be any unnecessary powder on the spacers 206 of Sakamaki, because the spacers 206 are only added *after* the powder application has been completed, and further, the powder on the ends of spacers 206 is not *removed*, but is actually *trapped* between the spacer 206 and the film roll 50a.

With respect to claim 21, Applicant respectfully submits that the Examiner's proposed combination of Ota with Sakamaki fails to cure the above-noted deficiencies of Sakamaki with respect to claim 21.

Dependent claims 25 and 28 depend from independent claim 19. Applicant respectfully submits that dependent claims 25 and 28 are allowable by virtue of their dependency from independent claims 19, which is believed to be allowable for at least the reasons discussed above.

Accordingly, Applicant respectfully requests withdrawal of the rejections, and allowance of the claims.

#### **IV. New Claims**

Applicant has added new claims 29-35 and 36-42, which respectively depend from independent claims 20 and 21 and recite language similar to that currently recited in dependent claims 22-29. Applicant respectfully submits that the new claims are allowable for at least the reasons indicated by the Examiner with respect to the already-allowable subject matter, as well as the additional reasons discussed above.

#### **V. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

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